

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:20-CR-36-1D(3)

FILED IN OPEN COURT

ON 3/5/2025
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES OF AMERICA)

v.)

JEFFREY KENNETH HAMILTON)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

In or about March 9, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, JEFFREY KENNETH HAMILTON, did knowingly attempt to procure his naturalization as a United States citizen contrary to law, by making a false statement under oath regarding his naturalization application, that is:

- a. On Part 12, Item 1 of defendant HAMILTON's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" he answered "No" when in fact as he then knew, he had claimed to be a United States citizen in a voter registration application on September 8, 2014.
- b. On Part 12, Item 2 of defendant HAMILTON's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" he answered "No" when in fact as he then knew, he had registered to vote on September 8, 2014.

All in violation of Title 18, United States Code, Section 1425(a).

COUNT TWO

On or about March 9, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, JEFFREY KENNETH HAMILTON, did knowingly make under oath, and did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, defendant HAMILTON stated falsely in an Application for Naturalization (Form N-400) that he had never claimed to be a United States citizen and he had never registered to vote in any Federal, State, and local election in the United States, when in fact, as he then and there knew, he had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on September 8, 2014.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT THREE

On or about March 9, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, JEFFREY KENNETH HAMILTON, did knowingly make a false statement under oath in a case, proceeding, and matter relating to, and under, and by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, defendant HAMILTON stated falsely under oath in an Application for Naturalization (Form N-400) that he had never claimed to be a United States citizen and he had never registered to vote in any Federal, State, and local

election in the United States, when in fact, as he then and there knew, he had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on September 8, 2014.

All in violation of Title 18, United States Code, Section 1015(a).

COUNT FOUR

On or about August 7, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, JEFFREY KENNETH HAMILTON, did knowingly attempt to procure his naturalization as a United States citizen contrary to law, by making a false statement under oath regarding his naturalization application, that is:

- a. On Part 12, Item 1 of defendant HAMILTON's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" he answered "No" when in fact as he then knew, he had claimed to be a United States citizen in a voter registration application on September 8, 2014.
- b. On Part 12, Item 2 of defendant HAMILTON's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" he answered "No" when in fact as he then knew, he had registered to vote on September 8, 2014.

All in violation of Title 18, United States Code, Section 1425(a).

COUNT FIVE

On or about August 7, 2018, in the Eastern District of North Carolina and elsewhere, the defendant, JEFFREY KENNETH HAMILTON, did knowingly make

under oath, and did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, defendant HAMILTON stated falsely in an Application for Naturalization (Form N-400) that he had never claimed to be a United States citizen and he had never registered to vote in any Federal, State, and local election in the United States, when in fact, as he then and there knew, he had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on September 8, 2014.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT SIX

On or about August 7, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, JEFFREY KENNETH HAMILTON did knowingly make a false statement under oath in a case, proceeding, and matter relating to, and under, and by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, defendant HAMILTON stated falsely under oath in an Application for Naturalization (Form N-400) that he had never claimed to be a United States citizen and he had never registered to vote in any Federal, State, and local election in the United States, when in fact, as he then and there knew, he had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on September 8, 2014.

All in violation of Title 18, United States Code, Section 1015(a).

COUNT SEVEN

On or about August 22, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, JEFFREY KENNETH HAMILTON, did knowingly procure his naturalization as a United States citizen contrary to law, by making a false statement under oath regarding his naturalization application, that is:

- a. On Part 12, Item 1 of defendant HAMILTON's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" he answered "No" when in fact as he then knew, he had claimed to be a United States citizen in a voter registration application on September 8, 2014.
- b. On Part 12, Item 2 of defendant HAMILTON's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" he answered "No" when in fact as he then knew, he had registered to vote on September 8, 2014.

All in violation of Title 18, United States Code, Section 1425(a).

A TRUE BILL


FOREPERSON

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

3-5-2020
DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney